

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re:</b>	<b>: Chapter 11</b>
	<b>:</b>
<b>Sears Holdings Corporation, <i>et al.</i>,</b>	<b>:</b>
	<b>: Case No.: 18-23538-(RDD)</b>
	<b>:</b>
<b>Debtors.</b>	<b>: (Jointly Administered)</b>
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**NOTICE OF APPEARANCE AND REQUEST  
FOR SERVICE OF NOTICE AND PLEADINGS**

**PLEASE TAKE NOTICE** that pursuant to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure<sup>1</sup>, New York State Attorney Barbara D. Underwood, hereby files this Notice of Appearance and Request for Notice and Pleadings on behalf of the New York State Department of Taxation and Finance, a party in interest in the above captioned bankruptcy case ("Case"), and does hereby request that all notices required to be given under Rule 2002, including notices under Rule 2002(i) that, but for this request, would be provided only to committees appointed pursuant to Title 11, U.S.C. § 101 *et seq.* or their authorized agents, and all papers served or required to be served in this Case and any related adversary proceeding, be given to and served upon:

Enid Nagler Stuart  
Assistant Attorney General  
Special Bankruptcy Counsel  
Office of the New York State Attorney General  
28 Liberty Street, 17<sup>th</sup> Floor  
New York, NY 10005

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<sup>1</sup> Unless otherwise stated, all references to "Rule" shall mean the Federal Rules of Bankruptcy Procedure.

**PLEASE TAKE FURTHER NOTICE** that the foregoing request includes not only notices and papers referred to in Rule 2002 but also includes, without limitation, notices of any applications, motions, orders, complaints, demands, hearings, requests or petitions, answering or reply papers, memoranda and briefs in support of any of the foregoing, disclosure statements, plans of reorganization, or any other document brought before this Court with respect to this Case, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, facsimile, electronic transmission or otherwise. The Clerk of the Court is requested to place the names and addresses of counsel as set forth in this Notice on any Master Service List in this case.

**PLEASE TAKE FURTHER NOTICE** that, neither this Notice of Appearance (“Notice”) nor any subsequent appearance, pleading or proof of claim, shall constitute a waiver of (i) the right to have final orders entered in non-core matters entered only after de novo review by a District Judge, (ii) the right to trial by jury in any proceeding triable in this case or any case, controversy, or proceeding related to this case, (iii) the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, (iv) any objection to the jurisdiction of this Bankruptcy Court for any purpose other than with respect to this Notice, and (v) any other rights, claims, actions, defenses, setoffs or recoupments as appropriate, in law or equity, or

under any agreements, all of which are expressly reserved.

Dated: New York, New York  
December 5, 2018

Respectfully submitted,

Barbara D. Underwood  
Attorney General of the State of New York  
Attorney for the New York State  
Department of Taxation & Finance  
By:

A handwritten signature in blue ink, appearing to read "Enid Nagler Stuart", is written over a horizontal line.

Enid Nagler Stuart  
Assistant Attorney General  
28 Liberty Street, 17<sup>th</sup> Floor  
New York, NY 10005  
Telephone: (212) 416-8666  
Email: enid.stuart@ag.ny.gov

**CERTIFICATE OF SERVICE**

I, Enid Nagler Stuart of the NYS Office of the Attorney General, hereby certify  
that on December 5, 2018, I electronically filed and served the attached *Notice of Appearance*,  
by using the CM/ECF system.

Executed on December 5, 2018

  
Enid Nagler Stuart